

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

William Terral Smith,

Debtor.

Case No. 22-13116-PMM
Chapter 13

Motion to Modify Plan After Confirmation

Debtor William Terral Smith, through his attorney, moves this Court as follows:

1. The Plan was confirmed on January 26, 2024.
2. The Debtor wishes to amend the plan to resolve the arrearage that gave rise to the Trustee's recent motion to dismiss.
3. The Debtor will file a supplemental Schedule J to demonstrate feasibility of the new plan.
4. The Debtor therefore requests approval of the Fifth Amended Plan filed at ECF No. 88.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: August 22, 2024

CIBIK LAW, P.C.
Attorney for Debtor

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